Daniel J. Sherman State Bar No. 18241000 SHERMAN & YAQUINTO, L.L.P. 509 N. Montclair Avenue Dallas, TX 75208-5498 214/942-5502 Fax: 214/946-7601 ATTORNEY FOR CHAPTER 7TRUSTEE

### IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	
	§	Case No. 09-34784-SGJ-7
ONDOVA LIMITED COMPANY,	§	
	§	
Debtor.	§	

## TRUSTEE'S AMENDED APPLICATION TO PAY STORAGE EXPENSES

ANY PARTY WISHING TO RESPOND TO THIS PLEADING MUST FILE THE RESPONSE WITH THE U.S. BANKRUPTCY CLERK, 1100 COMMERCE STREET, ROOM 12A24, DALLAS, TX 75242, AND SERVE A COPY ON THE TRUSTEE AT 509 N. MONTCLAIR AVENUE, DALLAS, TX 75208, WITHIN 21 DAYS OF THE SERVICE OF THIS PLEADING. IF A RESPONSE IS FILED AND SERVED TIMELY, A HEARING ON THE RESPONSE WILL BE SCHEDULED WITH A NOTICE TO THE RESPONDING PARTY ONLY.

IF NO RESPONSE IS FILED AND TIMELY SERVED ON THE TRUSTEE, THE COURT MAY DEEM THE RELIEF REQUESTED UNOPPOSED AND MAY ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT FURTHER NOTICE TO ANY PARTY.

TO THE HONORABLE STACEY G. JERNIGAN, U.S. BANKRUPTCY JUDGE:

Daniel J. Sherman, Trustee, files this amended application seeking authorization to pay the storage expenses, and in support, shows the Court the following:

#### TRUSTEE'S AMENDED APPLICATION TO PAY STORAGE EXPENSES

- 1. This case was commenced as a voluntary Chapter 11 filed on July 27, 2009. Daniel J. Sherman ("Trustee") was appointed as Chapter 11 trustee on September 17, 2009. The case was converted to a Chapter 7 on February 19, 2016 and Daniel J. Sherman remained the trustee.
- 2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §157; 28 U.S.C. §1334; and 11 U.S.C. §507. This is a core proceeding.
- 3. Prior to this case converting to a Chapter 7 case, Damon Nelson and AtWebDesigns, Inc. were handling the domain name renewals and monthly server fees and storage, and the estate paid the monthly expenses. AtWebDesigns has since been dissolved and the parent company is Launch Ninjas, Inc.
- 4. On June 30, 2016, Trustee filed a Motion to Pay Storage Expenses [docket #1275], however, an Order was never entered approving the motion. Trustee files this amended motion to update the request for payment to Launch Ninjas, Inc. for domain name renewal and monthly storage reimbursements.
- 5. The trustee seeks an order to authorize payment to Launch Ninjas, Inc.for domain name renewals in the amount of \$421.57; and monthly storage fees in the amount of \$2,103.75 for March, 2016 through November 2018 in the total amount of \$2,525.32.
- 6. The trustee further seeks an order to pay Launch Ninjas, Inc.for domain name renewals and monthly storage fees for each month until the case is closed.
- 7. The trustee currently has a total of \$282,392.25 on hand in the estate, and there are sufficient funds in the estate to pay the expenses to Launch Ninjas, Inc.

WHEREFORE, Daniel J. Sherman, trustee, asks this Court

- to authorize payment of \$2,525.32to Launch Ninjas, Inc. for domain name renewals and monthly storage fees for March, 2016 through November 2018;
- to authorize payment to Launch Ninjas, Inc. for domain name renewals and monthly storage fees for each month until all assets are sold and the case is closed; and
- to authorize any other relief to which he may show himself justly entitled.

Respectfully submitted,

/s/ Daniel J. Sherman

Daniel J. Sherman State Bar No. 18241000 SHERMAN & YAQUINTO, L.L.P. 509 N. Montclair Avenue Dallas, TX 75208-5498 214/942-5502 Fax: 214/946-7601 ATTORNEY FOR TRUSTEE

#### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the TRUSTEE'S AMENDED APPLICATION TO PAY STORAGE EXPENSES was forwarded by electronic transmission or regular first class mail, postage prepaid to the United States Trustee, 1100 Commerce Street, Room 976, Dallas, TX 75242, and to the parties included on the attached Service List, on this 21st day of November, 2018.

/s/ Daniel J. Sherman

Daniel J. Sherman

Case 09-34784-sgj7 Doc 1295 Filed 11/21/18 Entered 11/21/18 10:32:46 Page 4 of 7

Launch Ninjas Inc

Invoice

400 N. St. Paul, Suite 1040 Dallas, TX 75201

Date	Invoice #
11/16/2018	1009

Bill To		
Ondova Limited		

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
33	Reimbursement of Basement Storage Expenses for Ondova Limited (Files, books & records, cabinets, and office furniture) from Mar-16 to Nov-18	63.75	2,103.75
1	Domain Name renewals on GoDaddy from Mar-16 to Nov-18 (See attached spreadsheet from Godaddy with names and payment receipt numbers)	421.57	421.57
	Lean Sounday manage and payment records and sound		
		T-4-1	<b>***</b>
		Total	\$2,525.32

# Case 09-34784-sgj7 Doc 1295 Filed 11/21/18 Entered 11/21/18 10:32:46 Page 5 of 7

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# Case 09-34784-sgj7 Doc 1295 Filed 11/21/18 Entered 11/21/18 10:32:46 Page 6 of 7

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# Case 09-34784-sgj7 Doc 1295 Filed 11/21/18 Entered 11/21/18 10:32:46 Page 7 of 7

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